

No. 20-1204

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IN THE  
Supreme Court of the United States

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MARK RINGLAND,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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On Petition for a Writ of Certiorari to the  
U.S. Court of Appeals for the Eighth Circuit

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Amir H. Ali, hereby certify that I am a member of the bar of this Court, and that the document contains 1,745 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: June 1, 2021

/s/ Amir H. Ali  
Amir H. Ali  
*Counsel of Record for*  
*Petitioner Mark Ringland*